

# EXHIBIT A

UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF VIRGINIA  
RICHMOND DIVISION

In re  
CIRCUIT CITY STORES, INC., et al.,  
Debtors.

Chapter 11  
Case No. 08-35653 (KRH)  
Jointly Administered

**DECLARATION OF MARY HUNTER IN SUPPORT OF  
RESPONSE OF CATELLUS OPERATING LIMITED  
PARTNERSHIP TO LIQUIDATING TRUSTEE'S  
TWENTIETH OMNIBUS OBJECTION  
TO LANDLORD CLAIMS  
(Claim No. 7957)**

I, Mary Hunter, do hereby declare:

1. I am a Senior Property Manager for Catellus Development Group in Oakland California which operates the Pacific Commons Shopping Center located in Fremont, California that at all relevant times herein was owned by Catellus Operating Limited Partnership and in which Circuit City Stores West Coast, Inc. ("CC West") was a tenant. I am familiar with the matters set forth herein and if called upon could competently testify thereto.

2. In November of 2008 the total amount of monthly base rent and additional charges that should have been paid by CC West was comprised of \$64,915.58 for base rent, \$4,143.11 in CAM charges and \$56.45 for insurance payments. I calculated the pro-rata amount for the pre-petition period for November 1-10, 2008 as \$21,638.53 for base rent, \$1,381.04 for CAM and \$18.81 for insurance for a total amount of \$23,083.38. (Catellus received a payment for the November post-petition "stub rent" period for this location.)

3. Attached hereto as Exhibit "A" is a true copy of the invoice for work done

to remove abandoned property and fixtures and repair the damage to the premises after the return of the premises to Catellus by CC West. These costs were the responsibility of CC West under the lease. The total amount charged for the work attributable to the work on the Circuit City premises was \$37,300.00.

4. The original of Exhibit "A" is contained in the business records of Catellus Development Group in its offices in Oakland California.

I declare under penalty of perjury that the foregoing is true and correct. Executed this 1<sup>st</sup> day of APRIL, 2011 at Oakland, California.

Mary Hunter  
Mary Hunter

**EXHIBIT A**  
**To**  
**Mary Hunter**  
**Declaration**

66 Franklin Street  
To Suite 200  
Oakland, CA 94607

Pacific Commons



INVOICE NO: 63484

DATE: 4/30/2009

ACCOUNT NO: 826

SERVICES FOR: April

(Take Back/R+H)

Spa \$300  
5/21/09

### INVOICE

### DESCRIPTION OF SERVICES

Vacancy clean out of Circuit City - brought space back to vanilla shell 4/14/09 -

43,300.00

- 6,000.00

\$37,300.00

Total Reduced to offset expense from  
RTS fire safety to replace some  
fire monitoring devices that were removed.  
During clean out by Univision Maintenance  
D/H Winter

37,300.00

TOTAL  
\$37,300.00

### TERMS OF INVOICE

Net 15 days from date of invoice. A finance charge computed at a periodic rate of 1% per month (annual rate 12%) will be charged on balance remaining unpaid 30 days after date of invoice.

White = Customer Copy

Yellow = Send with Payments